

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

BMG RIGHTS MANAGEMENT (US) LLC,
et al.,

Plaintiffs,

v.

COX COMMUNICATIONS, INC, *et al.*,

Defendants.

Civil No. 1:14-cv-1611 (LO / JFA)

COXS' PROPOSED VERDICT FORM

Defendants Cox Communications, Inc. and Coxcom, LLC ("Cox"), pursuant to Federal Rule of Civil Procedure 49(a), submit the following proposed verdict form. Cox reserves the right to supplement this proposed verdict form in the event that issues arise during trial that were not reasonably anticipated and for all other purposes contemplated by the Federal Rules of Civil Procedure and the Local Rules.

Verdict Form

We the jury, in the above captioned action, answer the questions submitted to us as follows:

Question 1: Contributory Infringement:

Did BMG prove by a preponderance of the evidence that Cox is liable for contributory infringement of BMG copyrighted works?

Answer: Yes _____ No _____

If you answered yes to Question 1, you should proceed to Questions 2 and 3.

Question 2: Willfulness:

Did BMG prove by a preponderance of the evidence that Cox's conduct was willful?

Answer: Yes _____ No _____

Question 3: Damages:

What is the total amount of statutory damages that you award to BMG?

Amount: \$_____ Please sign and return the verdict form

Dated: August 21, 2018

Respectfully submitted,

/s/ Thomas M. Buchanan

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CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2018, a copy of the foregoing Defendants' Proposed Verdict Form was filed electronically with the Clerk of Court using the ECF system which will send notifications to ECF participants.

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